



State of Ohio Environmental Protection Agency

Southwest District Office

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Richard F. Celeste  
Governor

July 13, 1990

RE: DUPONT E.I. DeNEMOURS & CO  
NORTH BEND, OHIO  
HAMILTON CO.  
USEPA ID# OHD088656525

Mr. William Messenger  
Pre-Remedial Unit  
USEPA, Region 5  
230 South Dearborn Street  
Chicago, IL. 60604

Dear Mr. Messenger:

Ohio EPA has reviewed the FIT-prepared Screening Site Inspection Work Plan for the Dupont E.I. De Nemours & Co., Inc. Site located in North Bend, Ohio (Cincinnati). Detailed below are the Agency's comments concerning the work plan.

1. Section A, Site History: The history for this site was extremely brief and uninformative. A very good description is available in the narrative section of the PA, completed by the Southwest District Office of the Ohio EPA.
2. Section C, Item 2, Groundwater Sampling: The two residential wells mentioned in the sampling evaluation are both upgradient of the landfill site, several hundred yards away from the Ohio River. Several monitoring wells should be installed to the West of the site, in the general flow direction of the river. I would assume that the Ohio River is acting as the discharge point basin for any of the contaminants leaching out of the ponds or the landfill.
3. Please note that the State contact for this site is Mark A. Lehar of the Division of Emergency and Remedial Response. He can be reached at the letterhead address. *OK*
4. HRS Score Worksheets, Groundwater Route, Item 3: Containment should be scored a value of 3. In the SSI Justification, Section B, the author states that there is not a liner at any of the several dumping points referred to in this SSIWP. Information given in the PA also indicates that there is not a liner at any of the facilities at the site.
- OK* 5. Item 4: The PA notes that there were heavy metals dumped on site. A PA done in 1980 after receipt of the Eckhardt Report, indicates that "700 tons of earth contaminated with Vanadium Pentoxide" were buried on site. Toxicity and persistence should score an 18 for heavy metals while quantity should score 6 for 700 tons.

US EPA RECORDS CENTER REGION 5



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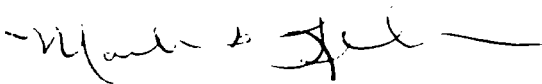
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6. Incorporation of comments 4 and 5 result in a new  $S_{gw}$  score of 55.26.
7. Surface Water Route, Item 3: See comment #4. The ponding areas are just that, ponding areas. There are no levees or barriers to prevent flooding or release into the creek.
8. Item 4: See comment #5.
9. Incorporation of comments 7 and 8 result in a new  $S_{sw}$  of 7.38.
- (0) 10. Incorporation of the new  $S_{gw}$  and  $S_{sw}$  scores result in a new  $S_m$  score of 32.23.
- (1) 11. Fire and Explosion: Due to the nature of the major known contaminant of the site, Vanadium Pentoxide, which is toxic if inhaled, this section should have been scored. The resulting smoke from a fire on the site could expose hundreds of people to toxic fumes.
- ✓ 12. Direct Contact, Item 1: For the purposes of the LSI, this item should have been scored as an observed incident to give a maximum possible figure.

Ohio EPA appreciates the opportunity to review and comment on this work plan and looks forward to seeing the revised document which incorporates our concerns.

Please contact me if you have any questions or wish to discuss the above comments in more detail.

Sincerely,



Mark A. Lehar  
Site Coordinator  
Division of Emergency and Remedial Response

MAL

cc: Mark Besel, DERR, CO  
Casey Sawal, E&E